

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District Of Texas
FILED

UNITED STATES DISTRICT COURT

MAR 11 2020

for the
Southern District of Texas

David J. Bradley, Clerk

United States of America
v.
Jose ROMERO
YOB: 1984 Citizenship: United States

Case No.

M-20-0680-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 10, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC Section 952(a)

Offense Description

Did knowingly and intentionally attempt to import into the United States from Mexico approximately 40.79 kilograms of methamphetamine, a Schedule II controlled substance under the Controlled Substance Act and 5.91 kilograms of heroin, a Schedule I controlled substance under the Controlled Substance Act, in violation of 21 United States Code Section 952(a).

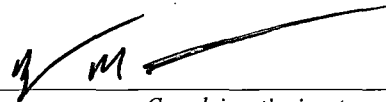
This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.Approved by AUSA Amy L. Greenbaum
Amy L. Greenbaum 3/11/2020

Sworn to before me and signed in my presence.

Date: _____

City and state: McAllen, Texas

Complainant's signature

Ryan McTaggart Special Agent HSI

Printed name and title



Judge's signature

J. Scott Hacker United States Magistrate Judge

Printed name and title

AFFIDAVIT

On March 10, 2020, Jose ROMERO (hereafter referred to as ROMERO) the driver, and sole occupant, of a vehicle bearing Texas license plates presented himself for admission at the Donna, Texas, Port of Entry.

ROMERO was referred for secondary inspection and, during secondary inspection, approximately forty (40.72) kilograms of methamphetamine and approximately five (5.91) kilograms of heroin were discovered concealed inside the tires of the vehicle.

All four tires of the vehicle contained narcotics and the narcotics were concealed by metal attached to the rims of the vehicle.

On March 10, 2020, ROMERO, under rights advisement and waiver, stated ROMERO knew ROMERO was driving a vehicle which contained "drugs" across the United States / Mexico International Boundary and ROMERO suspected ROMERO had previously driven a vehicle which contained narcotics across the United States / Mexico International Boundary on multiple occasions.